

## REMARKS

Reconsideration of this application in light of the present amendment and remarks is respectfully requested.

Claims 1-25 have been rejected.

Claims 1-25 were objected to.

Claims 1-25 have been amended.

Claims 1-25 are pending in this application.

### Formal Matters

Claim 25 has been rejected under 35 U.S.C. §112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicants regard as the invention. This rejection is respectfully traversed.

Independent claim 25 has been amended to comply with 35 U.S.C. §112, second paragraph, and to particularly point out and distinctly claim the subject matter which applicants regard as the invention, as requested by the Examiner. Specifically, the first occurrence (line 3) in claim 25 of “the access point” has been changed to “an access point”.

In addition, claims 1-25 have been amended to provide corrections in accordance with the Examiner suggestions.

Accordingly, applicant respectfully requests the Examiner to withdraw the above objections.

### Substantive Matters

#### **35 U.S.C. §102(a)**

Claims 1-19, 21, 22 and 25 have been rejected under 35 U.S.C. §102(a) as being anticipated by Haverinen (US 7107620). This rejection is respectfully traversed.

Independent claim 1 has been amended to reflect that the present invention addresses a different issue than Haverinen, and it is novel in that it discloses a unique method that can be used by a GPRS communication unit in an integrated GPRS/WLAN network in order to perform combined WLAN authentication and GPRS authentication to achieve simultaneous authentication on two systems. Support for this can be found in the specification on page 5 lines 16-18, and page 13 lines 20-22. A novel aspect of applicant's invention is the fact that the two authentication procedures (for WLAN and GPRS) are consolidated into a single authentication procedure. Haverinen is only concerned with authentication in one communication system and

therefore could not envision either the problem of authentication on two systems or applicant's novel solution for combined authentication on two systems using a single procedure.

The major benefit of applicant's disclosed combined authentication method is that handover from GPRS to WLAN is performed considerably faster because the WLAN authentication procedure and the GPRS authentication procedure are not sequentially executed, but rather they are combined into a single authentication procedure (shown in Fig. 4 of the present invention). This can bring considerable benefits to real-time applications, which cannot tolerate large latency during handover.

Haverinen does not consider how to combine the WLAN authentication procedure with the GPRS authentication procedure but instead considers how to authenticate a communication device on a single data network. Haverinen does not disclose or suggest a reason to combine the WLAN and the GPRS access control procedures as does the present invention. At best, Haverinen could only consider authentication procedures as separate, and therefore could only envision executed one authentication procedure on one data network followed by another authentication procedure on another network, and thereby suffers from high handover latencies. In addition, Haverinen does not assume that a WLAN can enforce IEEE 802.1x access control and therefore its applicability is limited only to single packet data networks. As noted above, the advantage of the present invention with respect to Haverinen is that it provides the means for fast handover from GPRS to WLAN.

In addition, the protocol architecture proposed by Haverinen (as per Figs. 2 or 10 of Haverinen) and the protocol architecture proposed by the present invention (as per Fig. 3 of the present invention) are completely different. This fact reinforces applicant's argument that the present invention addresses and solves a different issue than the one addressed in C. Moreover, Haverinen does not disclose or suggest the encapsulation of an authentication message of one network protocol into an authentication message of another network protocol.

Therefore, applicant respectfully submits that amended claim 1 is patentable and non-obvious over Haverinen. Claim 25 has been amended similarly to claim 1 and is therefore deemed inventive as well, for the same reasons.

Regarding claim 7, applicant respectfully disagrees with the Examiners contention that Haverinen (col. 21 lines 13-17) discloses the encapsulation of an authentication message of one network protocol into an authentication message of another network protocol. Instead this reference only recites how a single authentication procedure is triggered by software.

Similarly for claim 8, applicant respectfully disagrees with the Examiners contention that Haverinen (col. 8 lines 63-67 and Fig. 10 step 401) discloses the encapsulation of an authentication message of one network protocol into an authentication message of another

network protocol. Instead this reference only recites a request to start a single authentication procedure.

Similarly for claim 10, applicant respectfully disagrees with the Examiners contention that Haverinen (col. 23 lines 13-34 and Fig. 10 step 404) discloses the encapsulation of an authentication message of one network protocol into an authentication message of another network protocol. Instead this reference only recites the encryption of authentication in a single network protocol a response to a request to start a single authentication procedure.

Similarly for claim 11, applicant respectfully disagrees with the Examiners contention that Haverinen (col. 23 lines 53-63 and Fig. 10 step 421) discloses the encapsulation of an authentication message of one network protocol into an authentication message of another network protocol. Instead this reference only recites the sending of an answer to a request to start a single authentication procedure.

Similarly for claim 12, applicant respectfully disagrees with the Examiners contention that Haverinen (col. 24 lines 1-24 and Fig. 10 steps 424, 431, 441, 442, 451, 452) discloses the encapsulation of an authentication message of one network protocol into an authentication message of another network protocol. Instead this reference only recites providing an access key in a response for a single authentication procedure.

Similarly for claim 13, applicant respectfully disagrees with the Examiners contention that Haverinen (col. 24 lines 31-33 and Fig. 10) discloses the encapsulation of an authentication message of one network protocol into an authentication message of another network protocol. Instead this reference only recites a term for re-authentication for a single authentication procedure.

Similarly for claim 16, applicant respectfully disagrees with the Examiners contention that Haverinen (col. 20 lines 54-62) discloses the encapsulation of an authentication message of one network protocol into an authentication message of another network protocol. Instead this reference only discloses one network protocol for authentication for a single authentication procedure.

Similarly for claim 18, applicant respectfully disagrees with the Examiners contention that Haverinen (col. 21 lines 6-8, col. 22 lines 63-67, col. 23 lines 1-34 and 53-56, col. 24 lines 5-13 and 23-38 and Fig. 10 steps 401, 402, 403, 404, 411, 412, 421, 422, 431, 452, 453) discloses the encapsulation of an authentication message of one network protocol into an authentication message of another network protocol. Instead this reference only recites a single network protocol for a single authentication procedure.

Further, claims 2-19, 21, 22 are dependent on amended claim 1, hereby incorporated be reference, and are therefore deemed allowable as well for the same reasons.

Accordingly, applicant respectfully requests that this rejection be withdrawn.

**35 U.S.C. §103(a)**

Claims 20, 23 and 24 have been rejected under 35 U.S.C. §103(a) as being unpatentable over Haverinen in view of US 2003/0119481 (Haverinen2). This rejection is respectfully traversed.

Applicants respectfully submit that independent claim 1 has been amended into a condition for allowance as detailed above.

Claims 20, 23 and 24 are dependent on amended claim 1, hereby incorporated by reference, and are therefore deemed allowable as well for the same reasons.

Accordingly, it is respectfully submitted that this rejection has been overcome.

The other references of record have been reviewed and applicant's invention is deemed patently distinct and nonobvious over each taken alone or in combination.

For the foregoing reasons, applicants respectfully request that the above rejections be withdrawn.

Inasmuch as this amendment distinguishes all of the applicants' claims over the prior art references, for the many reasons indicated above, passing of this case is now believed to be in order. A Notice of Allowance is earnestly solicited.

No amendment made was related to the statutory requirements of patentability unless expressly stated herein. No amendment made was for the purpose of narrowing the scope of any claim, unless applicant has argued herein that such amendment was made to distinguish over a particular reference or combination of references.

Authorization is hereby given to charge any fees necessitated by actions taken herein to Deposit Account 50-2117.

Respectfully submitted,  
**Salkintzis et al.**

**Customer Number 22917**

Motorola, Inc.  
Law Dept. - 3<sup>rd</sup> floor  
1303 E. Algonquin Rd.  
Schaumburg, IL 60196

By: /Brian Mancini/  
Brian M. Mancini  
Attorney for Applicant(s)  
Registration No. 39,288  
Phone: (847) 576-3992  
FAX: (847) 576-3750